

EXHIBIT G

**Grae vs. Corrections
Corporation of America, et al.**

**Videotaped Deposition of
CAMERON HOPEWELL**

January 17, 2020

*****CONFIDENTIAL*****



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1 IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

3

VS .

9 Defendants.

13

CONFIDENTIAL

15	Nashville, Tennessee
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16 January 17, 2020

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20	Reported by:
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21 | Elisabeth A. Miller Lorenz

22	RMR, CRR, LCR No. 66
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24 | Job No.: 10064036

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Video deposition of CAMERON HOPEWELL was taken on behalf of Plaintiff, at Riley, Warnock & Jacobson, 1906 West End Avenue, Nashville, Tennessee, beginning at 10:01 a.m., and ending at 1:10 p.m., on Friday, January 17, 2020, before Elisabeth A. Miller Lorenz, RMR, CRR, and LCR No. 66.

1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Good morning. We
3 are now on the record. Today is January 17th, 2020.
4 The time is approximately 10:01 a.m.

5 This is the video deposition of
6 Cameron Hopewell; being taken in the matter of Grae
7 versus CCA on behalf of the plaintiff; pending in
8 the United States District Court for the Middle
9 District of Tennessee; Case No. 3:16-CV-02267.

10 We are here at Riley Warnock, 1906 West
11 End Avenue in Nashville, Tennessee.

12 My name is David Drumel. I'm the
13 videographer with Aptus Court Reporting.

14 Will counsel please identify yourselves
15 and state whom you represent.

16 MR. WOOD: Christopher Wood, Robbins
17 Geller, on behalf of plaintiff and the class.

18 MR. LYONS: Chris Lyons, Robbins Geller
19 Rudman & Dowd, on behalf of plaintiff and the class.

20 MR. WHITWORTH: Morgan Whitworth of
21 Latham & Watkins on behalf of defendants and the
22 witness.

23 MR. MCGEE: Trey McGee, Riley Warnock &
24 Jacobson, on behalf of the witness and defendants.

25 THE VIDEOGRAPHER: Thank you.

1 The court reporter today is
2 Elisabeth Lorenz, and she may now swear in the
3 witness.

4 * * *

5 CAMERON HOPEWELL
6 was called as a witness, and after having been first
7 duly sworn, testified as follows:

8 E X A M I N A T I O N

9 BY MR. WOOD:

10 Q Good morning, Mr. Hopewell.

11 A Morning.

12 Q Have you had your deposition taken before?

13 A No.

14 Q I'm sure your lawyers went over some of the
15 logistics, but just to perhaps reemphasize those.

16 It's important that we have a clear record
17 for the court reporter, so if you let me finish my
18 question before you answer, and I will let you
19 finish your answer before I ask you a new question.

20 Okay?

21 A Uh-huh.

22 Q It's also important that you answer verbally
23 with yes or no, whatever your answer is, rather than
24 head shakes or uh-huhs, because it's hard for the
25 court reporter to pick that up.

1 there's any reason to expand on that. It's a
2 requirement, so that's what you do. That's what I'm
3 charged with doing.

4 Q Well, it helps investors to value a company,
5 right? If they have accurate information; is that
6 fair?

7 A That's one component of -- of valuing a
8 company, yes.

9 MR. WOOD: I don't know why I do this.
10 Sometimes I put the exhibit sticker on my copy of
11 the...

12 (Marked Exhibit No. 173.)

13 BY MR. WOOD:

14 Q I'm passing you what's been marked as
15 Exhibit 173.

16 You mentioned the disclosure committee a
17 little bit earlier.

18 A Uh-huh.

19 Q What is the disclosure committee?

20 A It is a collection of -- of leadership at
21 the company from all various groups, so HR,
22 government relations, finance, real estate,
23 operations, health services, all -- all those folks
24 that -- that lead those various areas.

25 And it's charged -- it's -- it's a -- the

1 I, the undersigned, a Licensed Court
2 Reporter of the State of Tennessee, do hereby
3 certify:

4 That the foregoing proceedings were
5 taken before me at the time and place herein set
6 forth; that any witnesses in the foregoing
7 proceedings, prior to testifying, were duly sworn;
8 that a record of the proceedings was made by me
9 using machine shorthand, which was thereafter
10 transcribed under my direction; that the foregoing
11 transcript is a true record of the testimony given.

12 Further, that if the foregoing pertains
13 to the original transcript of a deposition in a
14 federal case, before completion of the proceedings,
15 review of the transcript [X] was [] was not
16 requested.

17 I further certify I am neither
18 financially interested in the action nor a relative
19 or employee of any attorney or party to this action.

20 IN WITNESS WHEREOF, I have this date
21 subscribed my name.

22 Dated: January 31, 2020

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Elisabeth A. Miller Lorenz

RMR, CRR, LCR No. 66